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Attorneys for Defendants
RIVERSOURCE LIFE INSURANCE COMPANY,
AMERIPRISE FINANCIAL SERVICES, INC.,
AMERIPRISE HOLDINGS, INC.
and AMERIPRISE FINANCIAL, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

PAUL M. DAVIS, individually and as
trustee/settlor/grantor of the PAUL M. DAVIS
REVOCABLE TRUST OF 2011, and the PAUL
M. DAVIS REVOCABLE TRUST OF 2011,

Plaintiffs,

vs.

RIVERSOURCE LIFE INSURANCE
COMPANY, a Minnesota corporation,
AMERIPRISE FINANCIAL SERVICES, INC.,
a Delaware corporation, AMERIPRISE
HOLDINGS, INC., a Delaware corporation, and
AMERIPRISE FINANCIAL, INC., a Delaware
corporation,

Defendants.

) Case No.: 3:16-cv-02801 JCS

) **JOINT STIPULATION TO**
) **CONTINUE DEADLINE FOR**
) **DEFENDANTS TO RESPOND TO**
) **PLAINTIFFS' COMPLAINT**

) Complaint Filed: May 24, 2016

**JOINT STIPULATION TO CONTINUE DEADLINE FOR
DEFENDANTS TO RESPOND TO PLAINTIFF'S COMPLAINT**

JOINT STIPULATION

Pursuant to Civil Local Rule 6-1, Plaintiff Paul M. Davis, individually and as trustee/settlor/grantor of the Paul M. Davis Revocable Trust of 2011 and Plaintiff the Paul M. Davis Revocable Trust of 2011 (“Plaintiffs”) and Defendants RiverSource Life Insurance Company (“RiverSource”), Ameriprise Financial Services, Inc., Ameriprise Holdings, Inc. and Ameriprise Financial, Inc. (collectively, the “Parties”), make a special and limited appearance to hereby jointly stipulate to an extension of time for Defendants to respond to Plaintiffs’ Complaint. The Parties agree and stipulate that Defendants will respond to Plaintiff’s Complaint on or before July 21, 2016. In support of this Stipulation, the Parties agree and stipulate as follows:

1. On May 24, 2016, Plaintiffs initiated the present action against Defendants in the United States District Court for the Northern District of California. (*See* ECF Doc. No. 1).

2. Defendants were served with the Summons and Complaint in this action on May 31, 2016. Defendants’ responsive pleading is therefore due on or before June 21, 2016.

3. The Parties have agreed to a thirty (30) day extension of time for Defendants to respond to Plaintiffs’ Complaint from the original date.

4. This Stipulation is necessary because Defendants’ counsel need additional time to review and research the issues raised by Plaintiffs’ Complaint and to frame appropriate responsive pleadings or motions. Nothing herein shall be construed as a waiver of any defense by any Defendant including, but not limited to, those defenses specifically identified in Rules 8 and 12 of the Federal Rules of Civil Procedure.

5. This Stipulation will not alter the date of any event or deadline already fixed by Court order.

We hereby attest that concurrence in the filing of this stipulation was obtained by each of the below identified signatories.

Date: June 21, 2016

MAYNARD, COOPER & GALE, LLP

By: /s/ Linda B. Oliver

Linda B. Oliver

Attorneys for Defendants

RIVERSOURCE LIFE INSURANCE COMPANY,
AMERIPRISE FINANCIAL SERVICES, INC.,
AMERIPRISE HOLDINGS, INC.
and AMERIPRISE FINANCIAL, INC.

Date: June 21, 2016

EVANS LAW FIRM, INC.

By: /s/ Michael A. Levy

Michael A. Levy

Attorneys for Plaintiffs PAUL M. DAVIS and the
PAUL M. DAVIS REVOCABLE TRUST OF 2011

Dated: June 23, 2016



PROOF OF SERVICE

STATE OF CALIFORNIA)
COUNTY OF SAN FRANCISCO)

I am employed in the County of San Francisco, State of California. I am over the age of 18 and not a party to the within action. My business address is 600 Montgomery Street, Suite 2600, San Francisco, California 94111.

On the date indicated below, I served the foregoing document described as:

**JOINT STIPULATION TO CONTINUE DEADLINE FOR
DEFENDANTS TO RESPOND TO PLAINTIFF'S COMPLAINT**

[X] BY CM/ECF ELECTRONIC SERVICE: On the following registered CM/ECF users with the Court, and have consented to service through the Court's automatic transmission of notice of electronic filing

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I declare that I am employed in the office of an attorney who has been admitted to this Court, at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed June 21, 2016, at San Francisco, California.


Mila Dunn

**JOINT STIPULATION TO CONTINUE DEADLINE FOR
DEFENDANTS TO RESPOND TO PLAINTIFF'S COMPLAINT**